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** ADMITTED IN PA and NJ ONLY

June 1, 2007

The Honorable Joseph J. Farnan, Jr.
United States District Court
for the District of Delaware
844 North King Street, Room 4209
Lock Box 18
Wilmington, DE 19801

Re: Drexel v. Harleysville
C.A. No. 05-428 JJF

Dear Judge Farnan:

I write in response to Mr. Beste's May 31, 2007 letter. Plaintiff's motion for summary judgment asks the court to construe the Harleysville's policy concerning cancellation of insurance coverage. Defendant's answering brief intends to demonstrate that the insurance policy was expired prior to the loss incurred by the plaintiff. These are legal matters. Should the court interpret the policy language as suggested by the defense, the natural consequence would be to conclude that as a matter of law the defendant is entitled to judgment.

The arguments made in the defendant's brief will not change whether or not defendant files a motion for summary judgment, however it will permit the court to give complete relief should the court agree with the defendant's position. In essence, the defendant's answering brief supports its motion for summary judgment.

Defendant is not asking for any additional time to file a brief, only to file the motion. There will be no delay. The defense response to plaintiff's motion for summary judgment will set forth the defendant's position. There would be no need for the court to extend any other deadlines.

Respectfully yours,


STEPHEN P. CASARINO

SPC/rt

cc: Robert Beste, Esquire
Kathleen Miller, Esquire